

**IN THE US DISTRICT COURT FOR THE EASTERN DISTRICT
OF OKLAHOMA**

RACHEL AINSWORTH,

Plaintiff,

vs.

**UNITED STATES of AMERICA
ex rel. THE DEPARTMENT of
HEALTH and HUMAN SERVICES,
PUBLIC HEALTH SERVICES,
INDIAN HEALTH SERVICES, and
CHOCTAW NATION HEALTH
CARE CENTER, and CHOCTAW
NATION HEALTH SERVICES,**

Defendants.

Case No. CIV 11-418-SPS

PLAINTIFF'S PRETRIAL DISCLOSURES

To: DEFENDANT, United States of America, through its attorney of record, Susan Stidham
Brandon: Asst. US Attorney, 1200 West Okmulgee Street, Muskogee, OK 74401.

Plaintiff, Rachel Ainsworth, makes these pretrial disclosures as required by Federal Rule of
Civil Procedure 26(a)(3).

A. Witnesses

1. Plaintiff expects to call the following witnesses at trial:

a. Plaintiff, Rachel Ainsworth

b. Dixie Hammonds

c. Sally L. Gaines, MSN, RN
6007 Linden Lane
Amarillo, TX 79106

d. Dr. Medhi Adham
Southwest Orthopedics
8100 S. Walker

Oklahoma City, OK 73139

e. Nathaniel Perryman Collins, JR., M.D.

15611 Kellan Ct.

Cypress, TX 77429

(713)410-5965

f. (Employees at CNH)

Dr. Floyd K. Goodman, M.D.

N. Arnold, RN

L. Noggle, LPN

A. Murdock, RN

Marty Vaughn, RN

S. White, R.N.

Choctaw Nation Hospital

1 Choctaw Way

Talihina, OK 74571

(918) 567-7000

g. All witnesses produced by Defendant

***Plaintiff reserves the right to amend this witness list.**

2. Plaintiff may call the following witnesses if the need arises:

An Economist to be named at a later date.

B. Depositions

3. Plaintiff expects to call the following witnesses by deposition:

a. Plaintiff, Rachel Ainsworth

b. Dixie Hammonds

c. Sally L. Gaines, MSN, RN

6007 Linden Lane

Amarillo, TX 79106

- d. Dr. Medhi Adham
Southwest Orthopedics
8100 S. Walker
Oklahoma City, OK 73139
 - e. Nathaniel Perryman Collins, JR., M.D.
15611 Kellan Ct.
Cypress, TX 77429
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 - f. (Employees at CNH)
Dr. Floyd K. Goodman, M.D.
N. Arnold, RN
L. Noggle, LPN
A. Murdock, RN
Marty Vaughn, RN
S. White, R.N.
Choctaw Nation Hospital
1 Choctaw Way
Talihina, OK 74571
(918) 567-7000
 - g. All witnesses produced by Defendant
- *Plaintiff reserves the right to amend this witness list.

C. Exhibits

5. Plaintiff expects to offer the following exhibits:

Plaintiff's medical records

Plaintiff's earning / financial statements

6. Plaintiff may offer the following exhibits if the need arises:

Depositions of witnesses

Medical Expert's report

RACHEL AINSWORTH,

Petitioner,

BY:



Jeff Belote, OBA#12213

PO Box 1910

McAlester, OK 74502

(918) 423-3344

(918) 423-3349 fax

Attorney for Plaintiff

CERTIFICATE OF SERVICE

I hereby certify that on the 24th day of February, 2012, I electronically filed the foregoing "Plaintiff's Rule 26 Disclosures" with the Clerk of the Court using the EFC system. Based on the records currently on file, the Clerk of the Court will transmit a Notice of Electronic Filing to the following ECF registrants: Susan Stidham Brandon, Attorney for the United States of America, Assistant United States Attorney, email: Susan.Brandon@usdoj.gov



Jeff Belote

Attorney for Plaintiff